

19 February 2008

FCC  
Washington, D.C.

Re: Localism proposals

Dear FCC,

Please consider these comments on your recent localism proposals. I have been in radio for over 30 years, doing everything from engineering, programming, sales, on-air, traffic, and management. I have owned a total of 8 radio stations in the Midwest and currently own KDLS-AM, KKRF-FM and KGRA-FM located in central Iowa. I want to stress that Radio is a BUSINESS, and in many cases a struggling one at this point. Any changes you force upon licensees that would increase their expenses will definitely result in a reduction in services and counter what you are trying to accomplish! I will comment on my understanding of each proposal individually:

***-24 Hour staffing***

Most responsible broadcasters, especially small market broadcasters like myself, fully staff their facilities during normal business-daylight hours and use automation systems at night. They are, however, ever-vigilant for those rare occasions when safety concerns necessitate airing of information critical to public safety and have plans in place for someone to get these messages on the air as well as maintaining their EAS equipment to quickly and efficiently re-broadcast critical messages. There is a HUGE problem though with the complexity of EAS receivers on the market and expectations of non-technical people to operate or monitor them.

24 hr staffing would require many stations to add 2 or 3 additional salaries to the payroll which would be financially impossible for me and many other stations that I know of as well. It would also be the "last straw" for many struggling stations and you would see numerous stations either going "dark" or coming up with methods to technically be legal but ridiculously ineffective at enhancing any localism.

***-Main Studio required in city of license***

If you will recall and research, the docket 80-90 proceedings of the 1980s resulted in the assignment of many FM channels to very small communities, nearly none of which have enough advertising revenue potential to support a radio station. Forcing a station now grouped with others in a nearby town to locate an office in a certain town serves no useful purpose for anyone and once again, is a financial impossibility for most.

Also, the increase of distance to 25 miles for the main studio was the protocol by which many groups were formed (mine included). Efficiencies in staffing, traffic, buildings, tech facilities and many other areas were realized and tearing that all apart again is just unthinkable financially. You must realize that in today's economy a stand-alone station in a smaller community is NOT a viable enterprise complicated by the fact that the number of people that are qualified to operate such a stand-alone operation or would even be interested in doing so is very small today. Implementation of this proposal to once again require the main studio in the city of license would result in many stations going "dark" with little or no interest from anyone in re-starting them.

#### ***-Voicetracking and Programming***

The boom in personal computers and the resulting availability of automation systems has greatly improved the quality of programming available to the public on radio to the point where a small station can sound as professional as a distant big-market station. . Small and mid-sized market broadcasters do not have the resources to hire and keep quality on-air people for all day-parts nor would they have the resources to properly guide a full staff on news, music selection etc. Again, any responsible and successful broadcaster will localize anything they do whether recorded or live. Listeners do not care, they simply want to hear the latest news or their favorite song.

Regarding "minimum requirements" for news or other programming elements, a successful broadcaster knows that to be accepted in the community, well-listened to and have the resultant financial success, he/she *must* be very local in his programming. That requirement varies in every market/situation and cannot be mandated by the FCC or anyone. If it is, it will simply drive programmers to air meaningless elements simply to meet the "legal" requirements.

Format Diversity is another fact that *must* be addressed in any programming considerations. Each station has a format and listeners become accustomed to that format and deviating from that to air "required" programs will simply send them to their ipods or Satellite receivers. While 6 hours a day of news and public affairs programming might be quite appropriate and popular on an AM talk station, attempting to require this on a music station would be disastrous to listenership, public service and revenues.

#### ***-Citizen Programming advisory boards***

The concept of using the input of community leaders to help plan programming is a worthwhile idea *but* these people are bankers, lawyers, govt employees, etc. etc. and while they certainly can potentially furnish good ideas, we are the broadcasters and licensees and should always have the final say on what goes on our station. Again, any successful broadcaster will have a working rapport with these community leaders without need of any requirements. On my station KDLS, we devote a long daily segment to nothing but community affairs and interviews because we have to do this in order for the station to be accepted and sell advertising. Mandating “boards” and “meetings” etc will simply waste precious station resources.

### *Summary*

The FCC should NOT re-regulate radio and introduce and re-introduce obsolete regulations which will do nothing to help the public interest and only serve to further depress and de-value an already fragile industry. Once again, radio is a BUSINESS and it will not work to attempt to FORCE stations to be local!!! This is especially true if these changes require added costs which most of them certainly would.

I would suggest as an alternative to this, an *education* process whereby you educate those broadcasters that apparently do not already know how important it is to be in touch with your *local* area and how to accomplish this! This not only increases public service but boosts the broadcaster’s bottom line enabling him to do even more. How about a national “localism” committee made up of FCC officials and successful broadcasters?

Let’s let common sense prevail here please!!!

Respectfully

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